

SCOTT R. COOK, ESQ.
Nevada Bar No. 005265
JONATHAN D. BLUM, ESQ.
Nevada Bar No. 009515
KOLESAR & LEATHAM
400 South Rampart Boulevard, Suite 400
Las Vegas, Nevada 89145
Telephone: (702) 362-7800
Facsimile: (702) 362-9472
E-Mail: scook@klnevada.com
jblum@klnevada.com

-and-

SCOTT J. SLAVICK, ESQ. (IL Bar No. 6256681) – *Admitted Pro Hac Vice*
SHARON E. CALHOUN, ESQ. (IL Bar No. 6294212) - *Admitted Pro Hac Vice*
HANNAH Y. JUROWICZ, ESQ. (IL Bar No. 6317050) – *Admitted Pro Hac Vice*
BARACK FERRAZZANO KIRSCHBAUM & NAGELBERG LLP
200 W. Madison Street, Suite 3900
Chicago, Illinois 60606
Telephone: (312) 984-3100
Facsimile: (312) 984-3150
E-Mail: scott.slavick@bfkn.com
sharon.calhoun@bfkn.com
hannah.jurowicz@bfkn.com

Attorneys for Defendant
AFFORDABLE CARE, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BOSTON DENTAL GROUP, LLC, a Nevada
limited liability company,

Plaintiff,

vs.

AFFORDABLE CARE, LLC, a North
Carolina limited liability company,

Defendant.

Case No.: 2:16-cv-01636-RFB-CWH

**STIPULATION AND PROPOSED
ORDER TO EXTEND THE PRETRIAL
ORDER DEADLINE TWENTY-EIGHT
(28) DAYS TO AUGUST 9, 2018**

(FOURTH REQUEST)

AND RELATED COUNTERCLAIM

1 Pursuant to LR IA 6-1 and 6-2, it is hereby agreed to and stipulated between
2 Plaintiff/Counterclaim Defendant Boston Dental Group, LLC (“Boston Dental”), by and
3 through its counsel, Michael R. Mushkin & Associates P.C. and Borghese Legal, Ltd., on the
4 one hand, and Defendant/Counterclaim Plaintiff Affordable Care, LLC (“Affordable Care”),
5 by and through its counsel, Kolesar & Leatham and Barack Ferrazzano Kirschbaum &
6 Nagelberg LLP, on the other hand, to a twenty-eight (28) day extension of the July 12, 2018
7 Joint Pretrial Order deadline, until August 9, 2018, for the purpose of allowing the parties to
8 finalize a settlement agreement, as further set forth herein. This is the fourth stipulation for
9 extension of time to extend the Joint Pretrial Order deadline.

10 On June 14, 2018, this Court extended the Pretrial Order deadline to July 12, 2018 to
11 allow the parties time to finalize a settlement agreement in principle. Since that time, the
12 parties have been working to finalize the settlement agreement. The parties are optimistic that
13 settlement negotiations will be concluded shortly. Accordingly, the parties seek a brief
14 twenty-eight (28) day extension of the Joint Pretrial Order deadline in order to finalize and
15 execute the settlement agreement. The litigation of this matter will be best served by the
16 proposed extension. There is good cause to grant the parties’ third stipulation for extension of
17 time because the parties only seek the extension to allow time to finalize the settlement in
18 principle. *See Fernandez v. N.V.*, Case No. 2011 WL 3957612 at *2 (Dist. Nev. Sept. 6,
19 2011) (granting motion for extension of time to file pretrial brief because parties engaged in
20 settlement negotiations).

21 Accordingly, the parties stipulate that the deadline for the Joint Pretrial Order be
22 extended for twenty-eight (28) days from July 12, 2018 to August 9, 2018.

23
24 **IT IS SO STIPULATED.**

25 DATED this 12th day of July, 2018

DATED this 12th day of July, 2018

KOLESAR & LEATHAM

BORGHESE LEGAL, LTD.

By /s/ Sharon E. Calhoun

SCOTT R. COOK, ESQ.
Nevada Bar No. 005265
JONATHAN D. BLUM, ESQ.
Nevada Bar No. 009515
400 South Rampart Boulevard, Suite 400
Las Vegas, Nevada 89145
scott@klnevada.com
jblum@klnevada.com

By /s/

MARK BORGHESE, ESQ.
Nevada Bar No. 6231
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
mark@borghesellegal.com

SCOTT J. SLAVICK, ESQ. (IL Bar No.
6256681) *Admitted Pro Hac Vice*
SHARON E. CALHOUN, ESQ. (IL Bar No.
6294212) - *Admitted Pro Hac Vice*
HANNAH Y. JUROWICZ, ESQ. (IL Bar No.
6317050) - *Admitted Pro Hac Vice*
**BARACK FERRAZZANO KIRSCHBAUM &
NAGELBERG LLP**
200 W. Madison Street, Suite 3900
Chicago, Illinois 60606
Telephone: (312) 984-3100
scott.slavick@bfkn.com
sharon.calhoun@bfkn.com
hannah.jurowicz@bfkn.com

MICHAEL R. MUSHKIN, ESQ.
Nevada Bar No. 2421
MICHAEL R. MUSHKIN & ASSOCIATES P.C.
4475 S. Pecos Road
Las Vegas, Nevada 89121
michael@mushlaw.com

Attorneys for Plaintiff
Boston Dental Group, LLC

Attorneys for Defendant
Affordable Care, LLC

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: July 13, 2018